

JS 44 (Ecw.7/95)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM).

I. (a) PLAINTIFFS**UNITED STATES OF AMERICA**

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Jordan M. Anger, AUSA
United States Attorney's Office
970 Broad St., Room 700
Newark, New Jersey 07102
(973)645-2829

DEFENDANTS**AMA CONSTRUCTION LLC**

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

Burlington

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

II. BASIS OF JURISDICTION (PLACE "X" IN ONE BOX ONLY)

- ☒ **1** U.S. Government Plaintiff
☐ **2** U.S. Government Defendant
☐ **3** Federal Question (U.S. Government Not a Party)
☐ **4** Diversity (Indicate Citizenship of Parties in item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- Citizen of This State ☐ **1** ☐ **1** Incorporated or Principal Place of Business in Another State ☐ **4** ☐ **4**
Citizen of Another State ☐ **2** ☐ **2** Incorporated and Principal Place of Business in Another State ☐ **5** ☐ **5**
Citizen or Subject of a Foreign Cntry ☐ **3** ☐ **3** Foreign Nation ☐ **6** ☐ **6**

IV. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

28 U.S.C. § 1345 - United States as Plaintiff

V. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/ PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input checked="" type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment at Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury Med. Malpractice <input type="checkbox"/> 365 Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Prod. Liab. PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Prod. Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure at Property 21 U.S.C. 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 U.S.C. 158 <input type="checkbox"/> 423 Withdrawal 28 U.S.C. 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 U.S.C. 3140 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determ. Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
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VI. ORIGIN☒ **1** Original Proceeding☐ **2** Removed from State Court☐ **3** Remanded from Appellate Court☐ **4** Reinstated or Reopened☐ **5** Transferred from another district (specify)☐ **6** Multidistrict Litigation☐ **7** Appeal to District Judge from Magistrate Judgement**VII. REQUESTED IN COMPLAINT:**CHECK IF THIS IS A CLASS ACTION
☐ UNDER F.R.C.P. 23**DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ YES ☐ NO**VII. RELATED CASE(S) IF ANY** (See instructions):

DATE

SIGNATURE OF ATTORNEY OF RECORD

Jordan M. Anger, Assistant United States Attorney

CRAIG CARPENITO
United States Attorney
JORDAN M. ANGER
Assistant U.S. Attorney
970 Broad Street, Room 700
Newark, NJ 07102
Tel. 973-645-2829
Fax. 973-645-3210
Email: jordan.anger@usdoj.gov

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,	:	HON.
	:	
Plaintiff,	:	Civil Action No.
	:	
v.	:	COMPLAINT
	:	
AMA CONSTRUCTION LLC	:	
	:	
Defendant.	:	

CRAIG CARPENITO, United States Attorney for the District of New Jersey, on behalf of plaintiff, United States of America, for its Complaint against defendant, AMA Construction LLC, says that:

1. This is a civil action brought on behalf of the United States of America and this Court has jurisdiction under the provisions of 28 U.S.C. Section 1345.
2. The defendant resides in Cinnaminson, within the state and district of New Jersey.

3. Defendant owes plaintiff the principal sum of \$63,360.00, as more fully set forth on the Certificates of Indebtedness attached hereto as Exhibit "A and B".

4. Due demand has been made for payment.

THEREFORE, plaintiff demands judgment against defendant as follows:

In the amount of \$108,152.59 (\$63,360.00 principal, \$2,341.79 interest accrued through October 17, 2018, \$13,733.97 penalties, \$40.00 administrative fees, \$25,432.25 DMS fees, and \$3,244.58 DOJ fees);

- b. Interest to accrue at the rate of 1.000% per annum from October 17, 2018 to date of judgment;
- c. Interest from the date of judgment at the legal rate in effect on the date of judgment until paid in full;
- d. Costs of suit; and
- e. For such other relief as this Court may deem just.

CRAIG CARPENITO
UNITED STATES ATTORNEY

By:  JORDAN M. ANGER
ASSISTANT U.S. ATTORNEY



U.S. DEPARTMENT OF THE TREASURY
BUREAU OF THE FISCAL SERVICE
WASHINGTON, D.C. 20227

ACTING ON BEHALF OF
U.S. Department of Labor, Occupational Safety & Health Administration
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and Address(es):

AMA Construction LLC
141 Route 130 South, Box 337
Cinnaminson, NJ 08077

RE: Treasury Claim TRFM1500277843

I certify that the U.S. Department of Labor, Occupational Safety & Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 57,200.00
Interest through 10/17/18*:	\$ 2,113.00
Penalty fee through 10/17/18*:	\$ 12,392.02
Admin fee:	\$ 20.00
DMS fees:	\$ 22,952.01
DOJ fees:	\$ 2,928.16

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

TOTAL debt owed as of 10/17/18: \$ 97,605.19

*NOTE: Per the creditor agency, once the debt is referred to Fiscal Service, interest continues to accrue at the rate of 1% per annum as well as a penalty at the rate of 6% per annum.

This debt reportedly arose in connection with the numerous workplace safety violations of the Occupational Safety and Health Act of 1970 (29 U.S.C. 650/651 et seq.) and OSHA regulations (29 C.F.R. 1926), as noted during the May 2014 OSHA inspections of the debtor's work site at S 19th & Lombard St, Philadelphia, PA 19146.

CERTIFICATION: Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U.S. Department of Labor, Occupational Safety & Health Administration.

X

Ashleigh N. Edmonds

October 17, 2018

Signed by: Ashleigh N. Edmonds

Ashleigh Edmonds
Financial Program Specialist
U.S. Department of the Treasury
Bureau of the Fiscal Service



U.S. DEPARTMENT OF THE TREASURY
BUREAU OF THE FISCAL SERVICE
WASHINGTON, D.C. 20227

ACTING ON BEHALF OF
U.S. Department of Labor, Occupational Safety & Health Administration
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and Address(es):

AMA Construction LLC
141 Route 130 South, Box 337
Cinnaminson, NJ 08077

RE: Treasury Claim TRFM1701181370

I certify that the U.S. Department of Labor, Occupational Safety & Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 6,160.00
Interest through 10/17/18*:	\$ 228.79
Penalty fee through 10/17/18*:	\$ 1,341.95
Admin fee:	\$ 20.00
DMS fees:	\$ 2,480.24
DOJ fees:	\$ 316.42

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

TOTAL debt owed as of 10/17/18: \$ 10,547.40

*NOTE: Per the creditor agency, once the debt is referred to Fiscal Service, interest continues to accrue at the rate of 1% per annum as well as a penalty at the rate of 6% per annum.

This debt reportedly arose in connection with the numerous workplace safety violations of the Occupational Safety and Health Act of 1970 (29 U.S.C. 650/651 et seq.) and OSHA regulations (29 C.F.R. 1926), as noted during the September 2014 OSHA inspections of the debtor's work site at 200 South Avenue, Building C-4, South Plainfield, NJ 07080.

CERTIFICATION: Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U.S. Department of Labor, Occupational Safety & Health Administration.

X *Ashleigh Edmonds*

October 17, 2018

Signed by: Ashleigh N. Edmonds

Ashleigh Edmonds
Financial Program Specialist
U.S. Department of the Treasury
Bureau of the Fiscal Service

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CHECK YES only if demanded in complaint:

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